



Montana Department of
ENVIRONMENTAL QUALITY

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Judy Martz, Governor

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July 11, 2003

Mr. Peter J. Borowiec, Jr., P.E.
Task Manager – Libby Asbestos Project
CDM Federal Programs Corp.
34 North Last Chance Gulch — Suite 104
Helena, MT 59601

RE: EPA Libby Class IV Asbestos Landfill (Lic. #99)

- (1) CONSTRUCTION INSPECTION**
- (2) RECEIPT OF EPA COMMITMENT TO CLOSURE FA**
- (3) CLASS IV LANDFILL OPERATIONS APPROVAL**

Dear Mr. Borowiec:

On May 28, 2003 I inspected the EPA Libby Class IV Asbestos Landfill for construction according to the approved design plans and specifications. Randy Huffsmith (CDM), David Schroeder (CDM), Courtney Zamora (Volpe), Ron Anderson (Lincoln Co.), and Chuck Jackson (ER) were on site during the inspection and all parties agreed that the proposed "misting tent" should effectively mitigate the potential for on-site release of friable asbestos fibers during construction. The air monitoring network surrounding the margin of the active cell will verify the misting tent performance. The landfill Unit A construction was completed as specified and with a few minor adjustments as recommended on site by Mr. Huffsmith, it will adequately meet the Class IV requirements for an unlined unit located within the Class II monitoring network.

On June 5, 2003 we received the letter of understanding from Jim Christiansen, EPA Superfund Remedial Project Manager, that commits EPA to provide adequate funding to close the asbestos landfill unit according to Class IV requirements. Please provide DEQ with a final signed copy of the Memorandum of Understanding (MOU) with Lincoln County.

On June 12, 2003 we received the updated Operations and Maintenance (O&M) Plan that included preliminary as-built plans, operation of the misting tunnel during disposal, air and groundwater Sampling and Analysis Plan (SAP), and lab data from the initial July 30, 2002 sampling of groundwater monitoring wells CDM-MW-1 and CDM-MW-8. Please contact Pat Potts (406.444.0538) for the required adjustments to the groundwater SAP and monitoring plans and the required format for the groundwater monitoring report of results from the May, 2003 sampling event. Also, please provide an addendum to the O&M Plan describing the SOPs for screening and removal of hazardous waste components prior to demolition and disposal of about 10 structures contaminated with friable asbestos.

The Class IV landfill construction is conditionally approved for initiation of operations and waste disposal in Unit A. Final approval will follow upon receipt, review, and approval of the final as-built plans and specifications, QA/QC report, groundwater monitoring report, and the few items listed above.

Mr. Borowiec

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We thank you for your ongoing cooperation and excellent efforts to address ARARs for this facility. If you have any questions or comments, please contact me at the Permitting and Compliance Division, Community Services Bureau, Waste Management Section: Voice (406) 444-4725, email tstepp@state.mt.us or FAX (406) 444-1374.

Sincerely,



Tim Stepp

Engineer —Solid Waste Program

Cc: Jim Christiansen, On-Scene Coordinator, EPA, Denver
Randy Huffsmith, CDM Federal, Helena
Ron Anderson, Lincoln County, Libby
Courtney Zamora, Volpe Center, 55 Broadway, Kendall Square, Cambridge, MA 02142-1093
File: Lic. # 99 Lincoln Co/Libby Class II Landfill/Class IV Unit
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